



Sullivan & Worcester LLP
1633 Broadway
New York, NY 10019

T 212 660 3000
F 212 660 3001
www.sandw.com

April 16, 2015

The Hon. Andrew L. Carter, Jr.
United States District Judge
Southern District of New York
40 Foley Square, Room 435
New York, New York 10007

Re: *The Export-Import Bank of the Republic of China v. République du Niger*, 97 CIV 3090 (LAK)

Dear Judge Carter:

We represent judgment creditor The Export-Import Bank of the Republic of China (“Ex-Im Bank”). We write, on behalf of Ex-Im Bank and SOPAMIN, to request a further extension (to Monday, April 20, 2015) to submit the joint status report on Ex-Im Bank’s discovery of SOPAMIN¹ that, pursuant to Your Honor’s April 13, 2015 memo endorsement, is due today.

Counsel for Ex-Im Bank and counsel for SOPAMIN are in Paris for settlement discussions between Ex-Im Bank and Niger. The discussions were delayed due to circumstances beyond Ex-Im Bank and SOPAMIN’s control, and have just begun today. With the Court’s permission, Ex-Im Bank and SOPAMIN can provide a report to the Court on Monday as to the status of Ex-Im Bank’s discovery of SOPAMIN, and the settlement discussions.

Respectfully submitted,

/s/ Paul E. Summit

Paul E. Summit

cc: Anthony Mavronicolas, Esq.
Patrick Croke, Esq.

¹ The parties continue to dispute the use of the term “discovery.” SOPAMIN characterizes the process as “voluntary disclosure,” but Ex-Im Bank rejects that characterization.